

QA 28000



**National Association
of Independent Insurers**

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GERALD W. BELL
DIRECTOR — COMMERCIAL & PROPERTY LINES

October 21, 1997

Docket Clerk
U.S. DOT Dockets, Room PL - 401
400 Seventh Street, SW.
Washington, DC 20590-0001

DEPT. OF TRANSPORTATION
OCT 23 11:30 AM '97

RE: **Docket No. FHWA-97-2759 - 30**
English Language Requirement; Qualification of Drivers

Dear Sir/Madam:

The insurance industry has always stood tall in its advocacy of vehicle and operator safety considerations. Although we are pleased that FHWA is considering the adequacy of current English language requirements of Section 391.11(b) of the FMCRSS, we are concerned that one aspect of the proposal could negatively affect highway safety.

The National Association of Independent Insurers (NAII) is a large, fast growing major property insurance trade association representing more than 560 member insurance companies. The Association's members produce and service nearly 26% of all the property and casualty insurance in the nation. NAII members insure about one-third (33%) of all the large trucks in the United States.

Since the nation's highways must be shared by a diversity of vehicle sizes and types, it is imperative for the safety of everyone that each operator can understand and correctly interpret the nation's traffic control devices, signage and rules of the road. When the current NAFTA motor carrier moratorium is eventually lifted, there will be a large influx of Mexican trucks operating on U.S. soil. A screening method must be developed before that date to assure that Mexican truck drivers exhibit a proficiency or working knowledge of English.

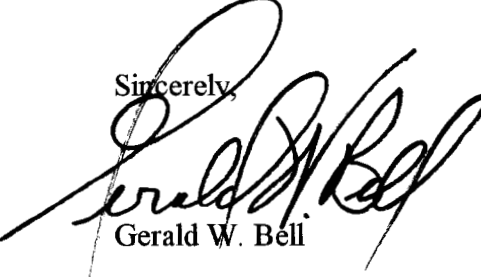
The modifications which FHWA proposes will weaken the standards for the expected language skills of drivers. This is of the utmost concern to our Association's members. It is difficult enough to operate a vehicle on the nation's congested high speed roads when English is one's native language. To weaken the standards for any large truck driver for whom English is a second language is a reckless compromise of life safety considerations for economic considerations.

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National Association of Independent Insurers

We urge the FHWA to take no action which would in any manner weaken current provisions of Section 391.11(b).

Sincerely,

A handwritten signature in black ink, appearing to read "Gerald W. Bell", is written over the word "Sincerely,". The signature is fluid and cursive, with a large initial "G" and "W".

Gerald W. Bell